

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND  
Northern Division**

**RON L. LACKS, PERSONAL  
REPRESENTATIVE OF THE ESTATE OF  
HENRIETTA LACKS,**

**PLAINTIFF,**

**VS.**

**THERMO FISHER SCIENTIFIC INC.,**

**DEFENDANT.**

Case No. 1:21-cv-02524-DLB

**STIPULATION AND [PROPOSED] ORDER CONCERNING AMENDED  
COMPLAINT AND MOTION TO DISMISS BRIEFING SCHEDULE**

Plaintiff Ron L. Lacks, Personal Representative of the Estate of Henrietta Lacks, and Defendant Thermo Fisher Scientific Inc. (“Thermo Fisher”) (together, the “Parties”) hereby stipulate and agree that Plaintiff’s amended complaint [ECF No. 33-1], which only corrects the name of the Plaintiff, shall not moot the pending motion to dismiss [ECF No. 20], which shall apply to the amended pleading. No changes are being made to the briefing schedule [ECF No. 22].

WHEREFORE, the Parties stipulate and agree that motion to dismiss is not mooted by the amended pleading stipulated above, and respectfully request that the Court enter an Order establishing this stipulation as agreed by the Parties.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_

Kim Parker

\_\_\_\_\_/s/\_\_\_\_\_

Tonya Kelly Cronin (Bar No. 27166)

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*\*Pro hac vice admission applications to be filed*

The Clerk shall docket the proposed amended complaint, ECF 33-1, as the amended complaint in this case.

SO ORDERED.

Dated: January 26, 2022

  
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Deborah L. Boardman  
United States District Judge